

Privacy Policy

Last updated: 4 May 2026

1. Who we are.

Private Operating ("the Service") is operated by Harry Davies, sole trader and sole data controller, NIF Y5041549D, operating from Spain. Privacy contact: harrycroxforddavies@gmail.com.

2. Scope.

This policy explains what personal data Private Operating collects when you create an account and use the Service, why it is collected, who it is shared with, how long it is kept, and what rights you have over it. It applies to data processed in our application and the third-party services listed in section 5.

3. What we collect.

(a) Account data: email, password (stored hashed by our authentication provider), display name, username. (b) Business records: invoices, expenses, contacts, projects, comments, notes, and free-text fields. (c) Files you upload: receipts, invoice PDFs, expense and project attachments. (d) Settings and integration secrets: business details (VAT, address, IBAN, bank), invoice series, locale, and the optional Telegram bot token / chat ID. (e) Operational logs: server-side error logs and timestamps of mutations, used for diagnostics; these do not include the substance of your business data. We do not run analytics or advertising trackers and do not collect device identifiers or behavioural profiles.

4. Legal basis (GDPR).

Processing relies on: contract performance (Art. 6(1)(b)) for delivering the Service; legitimate interests (Art. 6(1)(f)) for security, debugging and abuse prevention; legal obligation (Art. 6(1)(c)) for accounting and tax records under Spanish or EU law (typically up to six years); and consent (Art. 6(1)(a)) for optional features you explicitly enable, such as the Telegram integration.

5. Sub-processors.

Supabase (authentication, PostgreSQL database, file storage; EU-hosted). Anthropic (AI extraction of text from invoices and receipts; under our API plan content is not retained for model training). Telegram (only if you enable the Telegram bot, in which case messages and files you send to your bot are routed through Telegram's servers). We do not sell or rent personal data and do not share data with third parties beyond the processors above except where compelled by law.

6. International transfers.

Where sub-processors operate outside the European Economic Area, transfers are protected by Standard Contractual Clauses or equivalent safeguards approved under GDPR Art. 46.

7. Retention.

Active account data is held while your account is open. On account deletion we erase your account, profile, business records, uploaded files and integration secrets; server logs containing identifiers are deleted within 30 days. Records subject to accounting or tax retention obligations may be kept for the period required by Spanish or EU law (up to six years), and are not used for any other purpose.

8. Your rights.

Under GDPR and Spain's LOPDGDD (Organic Law 3/2018) you have rights of access, rectification, erasure, restriction, objection, portability, and withdrawal of consent where consent is the legal basis. You may also lodge a complaint with the Spanish Data Protection Agency (AEPD, www.aepd.es). To exercise these rights, email harrycroxforddavies@gmail.com from the address associated with your account; we aim to respond within 30 days.

9. Cookies.

Private Operating uses a small number of strictly necessary cookies to keep you signed in and to remember your locale preference. These are required for the Service to function and are not used for analytics or advertising.

10. Security.

Data is encrypted in transit (HTTPS) and at rest where the underlying services support it. Authentication is handled by Supabase, which stores password hashes using industry-standard algorithms. Production database access is restricted to the data controller. No security measure is perfect; please report vulnerabilities to the contact address above.

11. Changes.

Material changes will be reflected in the "Last updated" date and, where significant, notified to account holders by email. Continued use after a change constitutes acceptance.